



YUROK TRIBE

190 Klamath Boulevard • Post Office Box 1027 • Klamath, CA 95548



Ms. Rajinder Sahota
Assistant Division Chief
Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95812-2828

Re: Comments on the April 26, 2018 Workshop "to Discuss Possible Revisions to the Cap-and-Trade Regulation"

Dear Ms. Sahota,

Thank you for CARB's continued leadership in implementing California's cap-and-trade program. We, the Yurok Tribe, the largest California Tribe, participates in the carbon offset program as part of your cap and trade policy.

We are pleased and encouraged to see the progress CARB is making in revisions to its cap and trade program. CARB is continuing to administer a robust offset policy as part of California's efforts to reduce GHG emissions through 2030. In particular, we note that California's inclusion of forest based offsets has substantially enhanced the conservation and sustainable management of California's forests, while providing cost-effective GHG reductions and a host of other environmental benefits to the state.

We would like to specifically request CARB provide more clarity within its rule changes on how offset projects are impacted when an environmental, health and safety (EHS) violation may occur. We are a member of the California Forest Carbon Coalition (www.caforestcarbon.com) and support their proposal for how to provide clarity regarding how CARB could address EHS violations in carbon offset projects. Providing clarity on these rules will allow offset developers like us to develop more offset projects in California that help reduce in-state emissions, provide more jobs in California and help us reach our collective state greenhouse gas emission reduction goals.

We look forward to working with ARB to expand and improve the offset program going forward. California's carbon offset program has the potential to deliver even greater environmental benefits through rule improvements going forward. We look forward to working with ARB to build on this groundbreaking program that is a model for the rest of the country and the world.

Again, thank you again for the opportunity to provide you with our recommendations on this vitally important issue.

Sincerely,

Thomas P. O'Rourke, Sr.
Chairman



Phone: (707) 482-1350 • Fax: (707) 482-1377

